

# FisherBroyles

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June 16, 2021

**VIA ECF**

Honorable Debra Freeman  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, New York 10007

Re: *GateGuard, Inc. v. MVI Systems LLC; Samuel Taub; MVI Industries, LLC*  
Case No.: 1:19-cv-02472-JPC-DCF

Dear Judge Freeman:

I represent Plaintiff GateGuard, Inc. and write seeking an extension of time for the parties to file the joint submission initially discussed on April 22, 2021.

Last week, Defendants received an email from the Court's chambers asking the parties to file their joint submission by today. I was inadvertently not included on the email and only received it late yesterday (June 15, 2021) as a 'forward' from Defendants' counsel.

As such, I ask that the parties be granted until June 21, 2021 to finalize and file their joint submission. Defendants consent to this request.

Respectfully submitted,

By: /s/ Ariel Reinitz

Ariel Reinitz

cc: Counsel of Record (via ECF)